

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE: TERRORIST ATTACKS ON :  
SEPTEMBER 11, 2001 : 03-MDL-1570 (GBD)(SN)  
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This Document Relates To:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN) and member case  
*Burlingame, et al. v. bin Laden, et al.*, Case No. 02-cv-7230 (GBD)(SN)  
*Ryan, et al. v. Islamic Republic of Iran, et al.*, Case No. 1:20-cv-00266 (GBD)(SN)

**DECLARATION OF DENNIS G. PANTAZIS IN SUPPORT OF  
MOTION FOR ENTRY OF FINAL DEFAULT JUDGMENTS**

DENNIS G. PANTAZIS, Esquire, hereby states under penalty of perjury that:

1. I am an attorney with the law firm of Wiggins Childs Pantazis Fisher Goldfarb, LLC, attorneys for Plaintiffs in the above-captioned matters.
2. I submit this Declaration in support of this motion on behalf of Plaintiffs Kristen Breitweiser, as Personal Representative of the Estate of Ronald Breitweiser, Deceased, Kristen Breitweiser individually in her own right, and Caroline Breitweiser in the action styled *Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN) and member case *Burlingame, et al. v. bin Laden, et al.*, Case No. 02-cv-7230 (GBD)(SN).
3. This Motion is intended to supplant and substitute for the motion papers filed at MDL Doc. No.7644, which Plaintiffs Kristen Breitweiser, as Personal Representative of the Estate of Ronald Breitweiser, Deceased, Kristen Breitweiser individually in her own right, and Caroline Breitweiser withdraw.
4. The form of this motion and the relief requested herein are intended to comply with the Court's prior Orders, including specifically the Court's order of January 11, 2017, MDL Doc. No. 3422.

5. I have complied with the due diligence safeguards referenced in Section II.D. of the January 23, 2017, letter from the Plaintiffs' Executive Committees (MDL Doc. No. 3433).

6. I affirm that, after review of the matter by myself and attorneys affiliated with me in this action, I have personally verified that the relief sought on behalf of Plaintiffs Kristen Breitweiser, as Personal Representative of the Estate of Ronald Breitweiser, Deceased, Kristen Breitweiser individually in her own right, and Caroline Breitweiser against the Taliban and Muhammad Omar have not been awarded or requested in this or any other proceeding.

7. The form of this motion and the relief requested herein are also consistent with the form and relief requested and granted as to other Plaintiffs in this action.

8. The Motion, proposed Order, and this Declaration note that this case relates to *Ryan, et al. v. Islamic Republic of Iran, et al.*, as well as *Ashton* and *Burlingame*, because, while the instant Plaintiffs are parties in *Burlingame/Ashton*, these papers are being filed in the MDL and spread to the *Burlingame*, *Ashton*, and *Ryan* dockets. It is anticipated that these Plaintiffs will file a request for a transfer of these Plaintiffs' judgments to *Ryan*, as was previously done in regard to their judgments against the Islamic Republic of Iran and certain other Iran-related entities.

Date: March 16, 2022

/s/ Dennis G. Pantazis  
Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)  
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individually and in her own right, and Caroline  
Breitweiser*